

KURTIS & ASSOCIATES, P.C.

SUITE 600
2000 M STREET, N.W.
WASHINGTON, D.C. 20036

(202) 328-4500
TELECOPIER (202) 328-1231

Report to the Federal Communications Commission on Carrier Efforts Toward Attaining Digital TTY Accessibility, and the Status of the Various Technological Solutions, as Provided by CC Docket No. 94-102, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems

Cal-One Cellular, L.P. ("Cal-One"), by its attorneys, pursuant to the Federal Communications Commission's ("Commission") *Fourth Report and Order* in CC Docket No. 94-102,¹ hereby files a Quarterly Report for the quarter ending September 30, 2001, detailing its efforts towards attaining digital TTY accessibility, and the status of the various technological solutions that will help it attain that goal.

In the *Fourth Report and Order* the Commission established December 31, 2001 as the new deadline for carriers operating digital wireless systems to have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. It further established June 30, 2002 as the deadline for carriers to integrate, test and deploy the technology in their systems in conjunction with the public safety community. In order to be assured that the aforementioned deadlines will be met without complication, the Commission required digital wireless carriers to submit Quarterly Reports fifteen days after the end of each quarter.² Cal-One now files this instant report with the Commission.

I. Carrier Background

Cal-One provides analog CMRS wireless service in the California 1 - Del Norte RSA.³ Cal-One currently does not offer digital service in the above-referenced markets. As such, Cal-One has the ability to route, and will route calls to a TRS provider via the 911 dialing code over its analog network. Cal-One, however, intends to upgrade its network to provide digital wireless service in the near future, and as such is exploring issues related to providing TTY access to 911 over digital wireless service, including its ability to comply with the implementation deadlines established in the *Fourth Report and Order*.

¹In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket No. 94-102, 15 Fcc Rcd 25216, 65 Fed. Reg. 82293 (December 28, 2000), ("*Fourth Report and Order*").

²*Id.*

³Station KNKN233 (CMA336B).

II. Access to E911 Through TTY Devices

Cal-One uses analog AMPS equipment provided by Motorola, Inc. ("Motorola") for its wireless network infrastructure, and has requested a status update on Motorola's progress in achieving full compliance with the Commission's Rules which may be applicable to Cal-One in the future. Motorola's response is appended hereto as **Exhibit A**. Cal-One is not independently capable of verifying the information presented therein, but has no reason to believe it is not accurate.

Finally, the primary handset providers to Cal-One are Motorola and Nokia. Cal-One has recently requested that these handset manufacturers provide information on their progress in achieving full compliance with the Commission's rules from the standpoint of providing TTY-compatible digital handsets in sufficient time to allow for testing and compliance with the applicable in-service deadlines. Motorola's response is hereto appended as **Exhibit A**. Cal-One is not independently capable of verifying the information presented therein, but has no reason to believe it is not accurate. Cal-One has not yet received a response to its query from Nokia, and therefore, cannot report on its development activities. In the past, however, Nokia provided this information directly to the Commission in its own quarterly report. Cal-One presumes that Nokia will follow the same procedure for this quarter

The appended Motorola information is respectfully submitted in response to these issues, as required in the Commission's *Fourth Report and Order* (rel. Dec 14, 2000).

A. Development Activities

- (1) *Network Infrastructure Software Development*
- (2) *Handset Development and Testing Plans*
- (3) *Beta Testing and Lab Testing*
- (4) *Release and General Availability to Carriers of Network Infrastructure Software*
- (5) *Availability to Carriers of Full Acceptance Test Units*
- (6) *Efforts Toward Achieving Digital Wireless Solution Compatibility With Enhanced TTY Devices*

B. Testing and Deployment Activities

- (7) *Carrier Coordination of Testing With PSAP*
- (8) *Carrier Testing Activities, Including Field Testing, Consumer End-to-end Testing, and Other Necessary Tests*
- (9) *Retail Availability of Necessary Consumer Equipment*
- (10) *Geographic Scope of Network Infrastructure Deployment*

Cal-One does not presently offer digital service and therefore has not undertaken any testing and/or deployment on its network as of this date.

Respectfully Submitted,

Cal-One Cellular, L.P.

October 15, 2001

/s/ Michael K. Kurtis

Michael K. Kurtis

Anna E. Ward

It's Attorneys

Kurtis & Associates, P.C.
2000 M Street, N.W.
Suite 600
Washington, D.C. 20036
(202) 328-4500

EXHIBIT A

MOTOROLA
TTY COMPATIBILITY DEVELOPMENT STATUS REPORT
3rd Quarter 2001

Product	Standard	Status	Milestones	Progress
CDMA Handset	IS 127-3 IS 733-2	Integration & System Test	IOT: June 2001 UI: October 2001 ROM: December 2001 SA: 1Q 2002	Planning to participate in November ATIS testing with Sprint.
GSM Handset	TS 26.226 TS 26.230 TR 26.231	Integration & System Test	UI: October 2001 IOT: October 2001 ROM: December 2001 SA: 1Q 2002	Mobile to Mobile calls are functional. Optimization activities are on-going. IOT will start in October.
iDEN Handset		Beta in customer's lab	On plan	
TDMA Handset	IS 823-A IS 840-A	Integration & System Test	IOT: September 2001 UI: September 2001 ROM: October 2001 SA: 1Q 2002	Tested at AWS in Naperville, IL using Lucent Infrastructure. Tested both AMPS and TDMA.
CDMA Infrastructure	IS 127-3 IS 733-2	Ready for FOA	Field Testing: Nov 13-15, 2001	Infrastructure software in field has digital TTY support available now. Only handsets are needed to commence FOA.
iDEN Infrastructure		Beta in customer's lab	On plan	

Note: Motorola works with its carrier customers to provide them specific information related to their respective products.

Note: IOT is Inter Op Testing with RAM based parts for Character Error Rate testing
UI is User Interface testing with HCO / VCO support
ROM is the availability of ROM based phones. These should be functionally identical to a RAM phone.
SA is Ship Acceptance of production volume quantities

Al Lucas
Office of Access Excellence
Motorola
Phone: 561-739-2505
TTY: 561-739-2506

CERTIFICATE OF SERVICE

I, Carol A. Mindzak, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 15th day of October 2001, filed the foregoing “REPORT TO THE FEDERAL COMMUNICATIONS COMMISSION ON CARRIER EFFORTS TOWARD ATTAINING DIGITAL TTY ACCESSIBILITY, AND THE STATUS OF THE VARIOUS TECHNOLOGICAL SOLUTIONS, AS PROVIDED BY CC DOCKET NO. 94-102, IN THE MATTER OF REVISION OF THE COMMISSION’S RULES TO ENSURE COMPATIBILITY WITH ENHANCED 911 EMERGENCY CALLING SYSTEMS” electronically with the Federal Communications Commission’s Electronic Comment Filing System. I have also filed a diskette copy of this report with the Federal Communications Commission’s copy contractor, Qualex International. In addition, on this date, I have served copies of this Report via hand delivery or e-mail to the following:

Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Pam Gregory, Chief
Disabilities Rights Office
Consumer Information Bureau
Federal Communications Commission
445 12th Street, S.W., Room 6-C415
Washington, D.C. 20554

Kris Monteith, Chief
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C124
Washington, D.C. 20554

Melinda S. Littell*
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A161
Washington, D.C. 20554
mlittell@fcc.gov

/s/ Carol A. Mindzak

Carol A. Mindzak

* Sent via e-mail